

REMARKS

Claims 20-32 are pending in the above-identified patent application. Claims 20, 21, 22, 23, 24, 25 and 28 have been amended, and new Claims 32-36 have been added for consideration by the Examiner. Applicants respectfully request entry of this Amendment, and reconsideration and allowance of this application.

Applicants believe that the Amendment overcomes the rejections under 35 U.S.C. 112, second paragraph. Applicants request withdrawal of this rejection.

The rejection of Claims 20-25 and 27 under 35 U.S.C. 103(a) as being unpatentable over Fahy (U.S.P.N. 5,488,984) in view of Parkinson (U.S.P.N. 3,839,256), is respectfully traversed.

Fahy discloses a process for treating metal components, which are die punched from a sheet, that are used in manufacturing an electric motor. Fahy seeks to eliminate conventional practices for treating the metal components (e.g., acidic or atmospheric heat treatments). The treated metal components are exposed to molten aluminum.

Parkinson discloses a coating for use in manufacturing electrical steel sheets. At best, Parkinson discloses a coating for making the sheet stock that is ultimately used to make Fahy's components (i.e., Parkinson and Fahy are sequential not equivalent or related processes). Note that Parkinson discloses sheet stock not the punched or machined components employed by Fahy. The sheet stock coating applied by Parkinson is removed (from at least the newly exposed edges) during die punching to form Fahy's components. Fahy solves this problem by applying another coating that is tailored for exposure to molten aluminum. The respective differences in composition and utility of these coatings demonstrate that a skilled person in this art would lack the requisite motivation to substitute Parkinson's sheet stock coating for the electric motor component coating used by Fahy.

Neither Fahy nor Parkinson identify any problem with the insulation or handling characteristics of Fahy's components. A combination of Fahy and Parkinson teaches using Parkinson's coated sheet stock to manufacture Fahy's components; not using Parkinson's coating as a replacement for Fahy's coating. Note that the sheet stock

coating of Parkinson must retain its insulation properties after an anneal heating step whereas Fahy teaches away from such atmospheric heat treatments (compare Col. 1, Lines 19-23 of Parkinson to Col. 1, Lines 58-61 of Fahy). Further note that Parkinson does not disclose applying another coating after heat treating to improve handling characteristics, or applying another coating after converting the sheet stock into finished products. For these reasons, Applicants respectfully submit that a skilled person in this art would not combine Fahy and Parkinson and, assuming arguendo that these references could be combined, the combination fails to teach

The rejection of Claims 20-27, 28-29 and 31-32 under 35 U.S.C. 103(a) as being unpatentable over Fahy (U.S.P.N. 5,488,984) in view of Heimann (U.S.P.N. 5,714,093), is respectfully traversed.

Fahy contains the aforementioned deficiencies. These deficiencies are not remedied by Heimann. Heimann relates to gels, greases and coating for improving the corrosion resistance of metals. Fahy lacks any disclosure indicating that corrosion is a problem. Further, neither Fahy or Heimann provide any basis for equating or substituting corrosion resistance for resistance to molten metal or preventing adhesion/solder between steel and aluminum. Applicants, therefore, respectfully submit the requisite motivation to combine these references, which is based upon the disclosure in these references, has not been established. Improperly combined references cannot be employed to establish a prima facie case of obviousness and, accordingly, Applicants respectfully request withdrawal of this rejection.

The rejection of Claims 28 under 35 U.S.C. 103(a) as being unpatentable over Fahy and Parkinson and further in view of Miyosawa (U.S.P.N. 4,016,129), is respectfully traversed.

Fahy and Parkinson each contain the aforementioned deficiencies. These deficiencies are not remedied by Miyosawa. Miyosawa lacks any disclosure of using a silicate. Miyosawa dissolves silica (not a silicate) into polyvinyl alcohol. None of the applied references including Miyosawa provide any motivation to combine the applied references or to employ any combination to treat components for electric motors.

Applicants respectfully submit that in the absence of Applicants' disclosure these references would not be deemed related. The lack of such a relationship or combination fails to support a proper combination or prima facie case of obviousness.

The rejection of Claim 30 under 35 U.S.C. 103(a) as being unpatentable over Fahy and Parkinson or Heimann and further in view of Takimoto et al. (U.S.P.N. 5,298,059), is respectfully traversed.

Fahy, Parkinson and Heimann each contain the aforementioned deficiencies. Takimoto clearly teaches away from silica or a silica containing composition (e.g., see Abstract Takimoto). Further, Takimoto is limited to anticorrosive coatings and lacks any disclosure relating to protecting surfaces from molten metal or electric motors (e.g., rust-proofed steel for use in electrical appliances is not equivalent to usage in an electrical motor.). Takimoto, therefore, fails to remedy the deficiencies of the primary references and, accordingly, Applicants respectfully request withdrawal of this rejection.

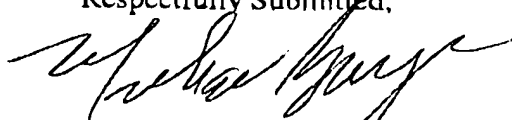
The rejection of Claim 31 under 35 U.S.C. 103(a) as being unpatentable over Fahy and Parkinson and further in view of Ettinger et al. (U.S.P.N. 4,479,104), is respectfully traversed.

Ettinger fails to remedy the aforementioned deficiencies of Fahy and Parkinson. Ettinger relates to transformer cores having an electrically insulating semi-conducting layer between laminations. The purpose of these electrically insulating layers is not identified as being useful as a molten metal protectant or that an electrical motor is improved by providing any degree of conductivity at an impulse voltage. For these reasons, Ettinger is not properly combined with the primary references and cannot establish a prima facie case of obviousness.

In instant application claims benefit of U.S. Patent Application Serial No. 09/549,119 (now U.S. Patent No. 6,455,100). Applicants respectfully request consideration of this patent as well as the references cited therein.

Applicants believe that the pending claims define patentable subject matter and respectfully request issuance of a Notice of Allowability for the instant application. Should there any fee due in connection with the instant application, please charge the same to Deposit Account No. 15-0680 (Orscheln Management Co.). Should the Examiner deem that any further action on the part of Applicants would advance prosecution of this application, the Examiner is invited to telephone Applicants' attorney.

Respectfully Submitted,



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